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June 1, 2021

**Via ECF**

Hon. James B. Clark, III, U.S.M.J.  
United States District Court  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: Collick et al. v. William Paterson University et al.  
Docket No. 16-471 (KM)**

Dear Judge Clark:

As Your Honor knows, this office represents plaintiffs in the above matter. Currently pending before the Court are two motions: (1) defendants' motion for summary judgment as to all issues; and (2) the parties' single, consolidated motion to seal pursuant to Local Civil Rule 5.3(c)(2). The undersigned forwarded the parties' motion to seal to the Passaic County Prosecutor's Office, which provided many of documents that constitute the expansive motion record, so that it had the opportunity to address and/or oppose the relief sought. On May 27, 2021, I received an email from Mary Catherine Ryan, Chief Assistant Prosecutor requesting additional time to review the materials and proposed redactions, which are voluminous. Accordingly, with the consent of defendants' counsel, it is respectfully requested that the Court adjourn the pending motion to seal to June 21, 2021.

We thank Your Honor in advance for your anticipated attention and cooperation in this matter.

Respectfully submitted,

/s/ Michael A. Rabasca  
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MAR/me

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